

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION**

**THIS DOCUMENT RELATES TO ALL
CASES**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

**DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFFS' "NOTICE TO
TAKE ORAL DEPOSITION OF DEFENDANTS THROUGH DESIGNATED
WITNESSES" AND ACCOMPANYING
REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants, Ethicon Inc. ("Ethicon") and Johnson & Johnson (collectively, "Defendants") hereby respond to Plaintiffs' "Notice to Take Oral Deposition of Defendants through Designated Witnesses" (the "Notice") and Exhibits "A" and "B" to the same. The Notice was filed and served on August 14, 2015 [Document 1661]. In response to the Notice, the Defendants refer to and incorporate herein the objections and responses in Defendants' Objections and Responses to Plaintiff's "Notice of Oral and Videotaped Deposition of Ethicon through Designated Witnesses" [Document 1627]. Further, Defendants specifically object to the deposition date identified in the Notice. In addition, Defendants state that the Notice is the subject of an ongoing meet-and-confer process with Plaintiffs' counsel. Defendants reserve the right to supplement their response to the Notice.

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on August 24, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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